Mona M. Murphy, Esquire Virginia Bar No. 21589 AKERMAN SENTERFITT LLP 8100 Boone Boulevard, Suite 700 Vienna, Virginia 22182-2642 (703) 790-8750 Counsel to Samsung Electronics America, Inc.

Objection Deadline: October 25, 2009

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA (Richmond Division)

IN RE:)	
)	
CIRCUIT CITY STORES, INC.,)	Case No. 08-35653 (KRH)
et al.)	(Chapter 11)
)	- · · · · -
Debtors.)	Jointly Administered

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT Samsung Electronics America, Inc. ("Samsung") has filed with the Court a Motion for Leave to Appear Telephonically (the "Motion") for this Court's October 27, 2009 Expedited Hearing on Samsung's Motion for Shortened Response Time to Interrogatories and Request for Production of Documents (the "Expedited Hearing") with respect to Circuit City Stores, Inc., et al. ("Debtors").

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) Under Local Bankruptcy Rule 4001-(a)-1, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing unless you take the following steps:

1. File with the court, at the address shown below, a written objection. If you mail your response to the Court for filing, you must mail it early enough so the court will **receive** it **not later than two business days before the October 27, 2009 Expedited Hearing**.

William C. Redden, Clerk of Court United States Bankruptcy Court Eastern District of Virginia 701 East Broad Street Suite 4000 Richmond, Virginia 23219

2. You must also deliver a copy to all creditors and parties-in-interest who are included in the United States Bankruptcy Court's ECF e-mail notification system and to:

Counsel for Circuit City Stores, Inc.
Douglas M. Foley, Esquire
McGuireWoods LLP
9000 World Trade Center
101 W. Main Street
Norfolk, Virginia 23510

Counsel for Samsung Electronics America, Inc. Mona M. Murphy, Esquire AKERMAN SENTERFITT LLP 8100 Boone Boulevard Suite 700 Vienna, Virginia 22182-2642

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

DATED: October 21, 2009 **AKERMAN SENTERFITT LLP**

By: /s/ Mona M. Murphy Mona M. Murphy, Esquire Virginia Bar No. 21589 8100 Boone Boulevard, Suite 700 Vienna, VA 22182-2642

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Case 08-35653-KRH Doc 5316 Filed 10/21/09 Entered 10/21/09 20:21:36 Desc Main Document Page 3 of 3

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 21st day of October, 2009, a copy of the foregoing Notice of Motion was sent to the United States Trustee, counsel for the Debtors, counsel for the unsecured creditors committee, and all creditors and parties-in-interest who are included in the United States Bankruptcy Court's ECF e-mail notification system for this case, by virtue the electronic filing of same. In addition, notice was given to Debtor's Counsel and the United States Trustee by telephone and electronic mail.

/s/ Mona M. Murphy